

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 05-11067-PBS

VOLKSWAGEN AG,)
VOLKSWAGEN OF AMERICA, INC.)
and BUGATTI INTERNATIONAL, S.A.,)
Plaintiffs,)
v.)
THE BUGATTI, INC.,)
Defendant.)

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), Margaret H. Paget, a member in good standing of the bar of this Court and of the Commonwealth of Massachusetts, moves to permit Susan B. Flohr, Esq. and Michael D. White, Esq. to appear in this action as counsel for the Plaintiffs.

The Court should allow this motion for the reasons set forth below and in the accompanying affidavits:

1. Susan B. Flohr and Michael D. White are members of the law firm of Blank Rome LLP located at 600 New Hampshire Avenue, NW, Washington, DC 20037. They represent the plaintiffs, Volkswagen AG, Volkswagen of America, Inc. and Bugatti International, S.A. and are intimately familiar with the facts giving rise to the plaintiffs' claims in this lawsuit.

2. Susan B. Flohr is a member in good standing of the bars of the District of Columbia (admitted in 1979), the United States Court of Appeals for the Federal Circuit (admitted in 1988), the Commonwealth of Virginia (admitted 1985), and the United States Supreme Court (admitted 1991).

3. Michael D. White is a member in good standing of the bars of the District of Columbia (admitted in 1982), the State of California (admitted 1983, inactive status), the Commonwealth of Virginia (admitted 1982) and the United States Patent and Trademark Office (admitted 1987).

4. There are no disciplinary proceedings pending against Susan B. Flohr or Michael D. White as members of the bar in any jurisdiction.

5. Susan B. Flohr and Michael D. White are familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Volkswagen AG, Volkswagen of America, Inc. and Bugatti International, S.A., respectfully request that their Motion for Admission Pro Hac Vice be ALLOWED.

Respectfully submitted,

VOLKSWAGEN AG, VOLKSWAGEN OF AMERICA, INC. and BUGATTI INTERNATIONAL, S.A.,

By their attorneys,



David A. Brown (BBO# 556161)
Margaret H. Paget (BBO# 567679)
Sherin and Lodgen LLP
101 Federal Street
Boston, Massachusetts 02110
Telephone: 617.646.2000

Dated: August 25, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (by hand) on Aug 25, 2005.

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Plaintiffs,)
v.)
THE BUGATTI, INC.,)
Defendant.)

**AFFIDAVIT OF SUSAN B. FLOHR IN SUPPORT OF HER MOTION FOR ADMISSION
PRO HAC VICE**

I, Susan B. Flohr, hereby depose and state as follows:

1. I am an attorney with the law firm of Blank Rome LLP located at 600 New Hampshire Avenue, NW, Washington, DC 20037.
2. I am a member in good standing of the bars of the District of Columbia (admitted in 1979), the United States Court of Appeals for the Federal Circuit (admitted in 1988), the Commonwealth of Virginia (admitted 1985), and the United States Supreme Court (admitted 1991).
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 25th day of August, 2005.



A handwritten signature in black ink, appearing to read "Susan B. Flohr". The signature is fluid and cursive, with "Susan" on top, "B." in the middle, and "Flohr" on the bottom right.

Susan B. Flohr, Esq.

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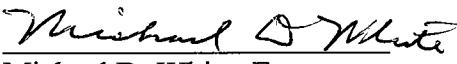
VOLKSWAGEN AG,)
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Plaintiffs,)
v.)
THE BUGATTI, INC.,)
Defendant.)

**AFFIDAVIT OF MICHAEL D. WHITE IN SUPPORT OF HIS MOTION FOR
ADMISSION PRO HAC VICE**

I, Michael D. White, hereby depose and state as follows:

1. I am an attorney with the law firm of Blank Rome LLP located at 600 New Hampshire Avenue, NW, Washington, DC 20037.
2. I am a member in good standing of the bars of the District of Columbia (admitted in 1982), the State of California (admitted 1983, inactive status), the Commonwealth of Virginia (admitted 1982) and the United States Patent and Trademark Office (admitted 1987).
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 25th day of August, 2005.


Michael D. White
Michael D. White, Esq.